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Attorneys for Defendant McAfee, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SAM WILLIAMSON, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

McAfee, Inc.,

Defendant.

Case No. 5:14-cv-00158-EJD

**JOINT STATUS REPORT AND
STIPULATED REQUEST TO CONTINUE
STATUS CONFERENCE**

Date: March 31, 2016
Time: 10:00 a.m.
Honorable Edward J. Davila

1 SAMANTHA KIRBY, individually and on
2 behalf of all others similarly situated,

3 Plaintiff,

4 v.

5 MCAFEE, INC.,

6 Defendant.
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Case No. 5:14-cv-02475-EJD

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2 WHEREAS, on July 8, 2015, the parties in the above-captioned *Williamson* and *Kirby*
3 actions informed the Court that they had reached an agreement in principle on certain key deal
4 terms, and requested that non-settlement proceedings in the *Williamson* and *Kirby* actions be
5 stayed pending the filing of a settlement for the Court's approval;

6 WHEREAS, on July 9, 2015, the Court granted the parties' request and entered an Order
7 staying all non-settlement proceedings in the *Williamson* and *Kirby* actions pending the filing of a
8 settlement for the Court's approval (Dkt. 70) ("Stay Order");

9 WHEREAS, the Court's Stay Order set a Status Conference, initially for October 8, 2015;

10 WHEREAS, at the request of the parties, the Status Conference has been continued and is
11 currently scheduled for March 31, 2016 at 10:00 a.m. (Dkt. 80);

12 WHEREAS, the parties hereby report that they have continued to work diligently on
13 negotiating final settlement terms, have made significant progress towards that end, and are
14 continuing to work, through the mediator, to resolve the lone remaining issues; and

15 WHEREAS, in light of such progress and the parties' ongoing efforts, the parties
16 respectfully request that the Court continue the upcoming Status Conference to April 21, 2016,
17 and that the parties be directed to file a joint statement in advance of such Status Conference to
18 report on their progress and when they anticipate filing a motion for preliminary settlement
19 approval;

20 NOW THEREFORE, ALL PARTIES, BY AND THROUGH THEIR UNDERSIGNED
21 COUNSEL hereby stipulate and respectfully request that:

22 The Status Conference currently scheduled in the *Williamson* and *Kirby* actions for
23 March 31, 2016 at 10:00 a.m., be continued until April 21, 2016 at 10:00 a.m., with the parties
24 filing a joint statement by no later than April 14, 2016 to report on their progress and when they
25 anticipate filing a motion for preliminary settlement approval.

26 **IT IS SO STIPULATED.**
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2 Dated: March 24, 2016

3 WILLIAMS & CONNOLLY LLP

4 By: /s/ Daniel F. Katz
5 Daniel F. Katz
6 Attorneys for Defendant
McAFEE, INC.

7 Dated: March 24, 2016

8 LUBIN OLSON & NIEWIADOMSKI LLP

9 By: /s/ Michael F. Donner
10 Michael F. Donner
11 Attorneys for Defendant
McAFEE, INC.

12 Dated: March 24, 2016

13 LIEFF CABRASER HEIMANN & BERNSTEIN
14 LLP

15 By: /s/ Roger N. Heller
16 Roger N. Heller
17 Attorneys for Plaintiff
SAM WILLIAMSON

18 Dated: March 24, 2016

19 HATTIS LAW

20 By: /s/ Daniel M. Hattis
21 Daniel M. Hattis
22 Attorneys for Plaintiff
SAM WILLIAMSON

23 Dated: March 24, 2016

24 AHDOOT & WOLFSON, P.C.

25 By: /s/ Tina Wolfson
26 Tina Wolfson
27 Attorneys for Plaintiff
SAMANTHA KIRBY

28 PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: 3/25, 2016


EDWARD J. DAVILA
United States District Judge

SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing document. In compliance with General Order 45, I hereby attest that the signatories indicated above via a conformed signature have concurred in this filing.

By: /s/ Roger N. Heller

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